



March 15, 2012

Regional Administrator
USEPA Region 5
Mail Code SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3507
Attn: Michelle Kerr

Director, Remediation
Site Remediation Section
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155
Attn: Nile Fellows

John Jones
Vertellus Specialties, Inc.
201 North Illinois Street, Suite 1800
Indianapolis, IN 46204

Subject: United States of America, et al. vs. Reilly Tar & Chemical Corporation, et al.
File No. Civ. 4-80-469 CD-RAP Section 3.3

Dear Project Leaders,

The City of St. Louis Park has prepared the attached "2011 Annual Progress Report" in accordance with the above reference. You may direct any questions or comments to this office.

Sincerely,

A handwritten signature in black ink that reads "William M. Gregg". The signature is written in a cursive, flowing style.

William M. Gregg
Project Leader for the City of St. Louis Park

cc: Scott Anderson, City of St. Louis Park

**2011 ANNUAL PROGRESS REPORT
ON THE
IMPLEMENTATION OF THE CONSENT DECREE**

SUBMITTED TO THE

**REGIONAL ADMINISTRATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V**

**EXECUTIVE DIRECTOR
MINNESOTA POLLUTION CONTROL AGENCY**

BY

THE CITY OF ST. LOUIS PARK, MINNESOTA

**PURSUANT TO
CONSENT DECREE - PART K**

UNITED STATES OF AMERICA, ET AL.

VS.

REILLY TAR & CHEMICAL CORPORATION, ET AL.

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
CIVIL NO. 4-80-469**

MARCH 15, 2012

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1. INTRODUCTION

The Consent Decree in United States of America, et al. vs. Reilly Tar & Chemical Corporation, et al. (U.S. District Court, Minnesota, Civil No. 4-80-469) was signed by Judge Magnuson on September 3, 1986, and entered by the Court on the following day. The effective date of the Consent Decree is therefore September 4, 1986 (see Part EE of the Consent Decree).

The Consent Decree requires various actions to be taken by Reilly Industries, Inc. (now known as Vertellus Specialties Inc. but referred to in this report as Reilly), the City of St. Louis Park (City), the United States Environmental Protection Agency (USEPA), the Minnesota Pollution Control Agency (MPCA), and/or the Minnesota Department of Health (MDH). These actions are required by the Consent Decree itself, by the Remedial Action Plan (CD-RAP) (Exhibit A to, and an integral and enforceable part of the Consent Decree, per Part F thereof), or by an Agreement between Reilly and the City (Reilly/City Agreement) (Exhibit B to, and an integral and enforceable part of the Consent Decree, per Part Q thereof, as to the rights and responsibilities between Reilly and the City).

This Annual Progress Report (Report) submitted in accordance with the requirements of Part K of the Consent Decree describes actions taken to implement the requirements of the Consent Decree from January 1 through December 31, 2011. This Report also describes activities scheduled for calendar year 2012, as required by Part K. Two other annual reports are required and are submitted by March 15th of each year under separate cover. The Annual Monitoring Report presents all chemical analyses and water level measurements for that calendar year that are not presented in other reports. The second annual report is the Annual Performance Report for the granular activated carbon treatment system. That report discusses chemical analyses and pumping requirements for municipal wells SLP10 or SLP15 and for SLP4.

As an aid to the reader in following the progress of the many activities involved, this Report provides separate descriptions of completed and scheduled activities required by the Consent Decree (Report Sections 2.0 and 3.0, respectively) and by the CD-RAP (Report Sections 4.0 and 5.0, respectively). Within each section, areas of activity are discussed in the order in which they are discussed in the Consent Decree and CD-RAP.

2. COMPLETED CONSENT DECREE ACTIVITIES

Part K of the Consent Decree requires that Reilly submit annual progress reports to the USEPA and MPCA by March 15, which describe actions taken to implement the requirements of the Consent Decree during the previous year and describe activities scheduled for the year in which the report is released. The City, on behalf of Reilly, submitted the 2010 Annual Progress Report on March 15, 2011, pursuant to the requirements of Part K, of the Consent Decree. The Agencies' letter dated April 6, 2011 determined the 2010 Progress Report was acceptable.

Part L of the Consent Decree requires all notices, correspondence, and reports forwarded from one party to another to be delivered by certified mail or equivalent receipt. During 2008, it was established during a conference call that electronic mail may be used as an acceptable option for official Reilly Site correspondence. A City letter dated October 23, 2008 documented this method for all future correspondence. Hard copies of reports will be submitted to the Agencies via regular mail. Return mail-receipt will no longer be necessary.

Part O of the Consent Decree states that Reilly, the City, the USEPA, or the MPCA may change its designated Project Leader and alternate by notifying the other Parties, in writing, of the change. No such changes were made during 2011.

Part Y of the Consent Decree requires Reilly to provide the USEPA and MPCA with current certification of insurance for certain specified coverage. Reilly wrote the USEPA and MPCA on July 7, 1987, to request that the excuse granted to Reilly on October 7, 1986, from meeting certain notification requirements for insurance cancellation is extended to July 1, 1988. The USEPA and MPCA approved this request on September 9, 1987. On March 28, 1991, Reilly submitted certificates of insurance for liability coverage; indicating excess coverage was in place. Reilly submitted information in partial compliance with Part Y and informed the Agencies that reasons necessitating an excuse continued to be valid, thereby causing it to request further extension of the excuse (relating to the language of the insurance certificates).

Part Z of the Consent Decree requires Reilly to provide financial assurance for various CD-RAP activities. Many changes to this requirement have been made over the years, with the most recent occurring on August 29, 2011 date at which time the Agencies requested \$238,000 of financial assurance. In accordance with its agreement with the Agencies, Reilly has provided a letter of credit as it's instrument of financial assurance.

3. SCHEDULED CONSENT DECREE ACTIVITIES

Part P of the Consent Decree addresses the issue of securing access agreements to conduct the various activities contemplated in the CD-RAP. In the past, the City has commenced negotiations with various parties from whom access authorization must be obtained based upon the content of Agency correspondence dated May 3, 1989. Said correspondence approved a revision in access agreement language for certain properties owned by the Minneapolis Parks and Recreation Board; however, the Agencies indicated they would review each agreement on a case-by-case basis. Accordingly, individual negotiations will be initiated with each affected property owner whereon the City must perform Consent Decree related activities in 2012 in an effort to secure similar agreements to those which were approved by the Agencies on May 3, 1989. No additional access agreements were made during 2011.

Part Q of the Consent Decree acknowledges the Reilly/City Agreement as Exhibit B to, and an enforceable part of the Consent Decree. Section 2 of the Reilly/City Agreement provides that by September 3, 1990, if necessary to avoid sanitary sewer charges on the discharge from wells W23, the Drift-Platteville Aquifer source control wells and gradient control well, Reilly shall plan, obtain necessary permits for, and construct a treatment facility and piping to allow effluent from the wells to be discharged to a storm sewer. As noted in Section 2 of the 1991 Annual Progress Report, a treatment facility was made operational in 1991, treating water discharged from wells W23, and the Drift-Platteville Aquifer source control wells (W420 and W421). Treatment is not available for the discharge from the Drift Aquifer gradient control well (W439), or the St. Peter Aquifer gradient control well (W410).

Section 9 of the Reilly/City Agreement provides for the payment by one party of costs incurred by the other party or the sharing by the parties thereto of costs incurred by one party in the implementation of the CD-RAP. Within 30 days of the close of the calendar quarter, in which the costs were incurred, the party incurring the costs shall issue a detailed statement of costs, including supporting documentation, and within 30 days of receipt of such notice, the owing party shall pay to the other its share of the costs. It is anticipated the parties will respond to said submittals in accordance with the provisions of the Reilly/City Agreement, or any other agreement between the City and Reilly.

Part T of the Consent Decree addresses compliance with all applicable local, state, and federal laws and regulations when implementing the Consent Decree. Among its provisions is the requirement that the USEPA and MPCA approve any facility used for off-site disposal of hazardous substances generated during work undertaken pursuant to the Consent Decree. If

either Reilly or the City proposes to use a facility in 2011, the Agencies must confirm the status of the facility before the shipment of hazardous wastes commences.

4. COMPLETED REMEDIAL ACTION PLAN ACTIVITIES

Progress continued in the implementation of the CD-RAP during 2011. Operation of source and gradient control wells occurred throughout the year in the Prairie du Chien-Jordan Aquifer (W23, SLP4 and SLP10/15), St. Peter Aquifer (W410) and the Drift-Platteville Aquifer (W420, W421, and W439). In addition, monitoring of the Mount Simon-Hinckley, Prairie du Chien-Jordan, St. Peter, and Drift-Platteville Aquifers was completed. Table 1 summarizes the progress made in completing the required activities in the CD-RAP. Further details on the CD-RAP activities are provided below.

4.1 CD-RAP Section 2

Section 2.4 of the CD-RAP requires all wells installed, reconstructed or abandoned in compliance with the requirements of the RAP must be in accordance with all applicable provisions of the MDH well code. The notification of and approval by the Commissioner is required. No wells were installed, abandoned, or reconstructed during 2011 to comply with the CD-RAP.

4.2 CD-RAP Section 3

Section 3.3 of the CD-RAP requires Reilly to submit annual Sampling Plans to the USEPA and MPCA by October 31 of that year for the following year. Section 2(a) of the Reilly/City Agreement provides that the City assume all of Reilly's obligations under Section 3 of the CD-RAP. The 2012 Sampling Plan was submitted to the Agencies on October 31, 2011. A series of letters and telephone calls ensued and a revised sampling plan was approved by the Agencies after December 31, 2011 and prior to sampling in 2012. The next year's sampling plan will continue to be submitted on October 31 each year, in accordance with Section 3.3 of the CD-RAP.

The sampling plans have historically contained a current version of the Quality Assurance Project Plan (QAPP). In a letter dated October 23, 2008, the City de-coupled these documents to be submitted separately. The next year's QAPP will continue to be submitted on June 30 each year. The 2011 QAPP was granted final approval in the Agencies' letter dated December 8, 2010. No changes to the QAPP were proposed for 2012, therefore the City requested on June 29, 2011 that the 2011 QAPP be used in 2012 as well. At the Agencies' request, an electronic version of the complete QAPP was provided to the Agencies on September 27, 2011.

Section 3.4 of the CD-RAP requires Reilly to submit an Annual Monitoring Report to the USEPA and MPCA containing the results of all monitoring during the previous calendar year. The City submitted the 2010 Annual Monitoring Report on behalf of Reilly on March 15, 2011. An

Agencies' letter dated April 6, 2011 stated that the 2010 report was acceptable.

4.3 CD-RAP Section 4

The City operated the granular activated carbon (GAC) treatment system for municipal wells SLP10/15 in substantial compliance with Section 4.2 of the Remedial Action Plan (RAP) during 2011. A summary of the 2011 monthly pumping data is presented on Table 2. The City will forward the 2011 GAC system monitoring report to the Agencies by March 15, 2012, in accordance with CD-RAP Section 4.3.5.

Municipal well SLP10 pumped mostly without incident during 2011. SLP 10 pumped a total of 243 million gallons of groundwater in 2011, thus meeting the CD-RAP required minimum annual pumping rate of 200 million gallons per year.

In accordance with Section 4.3.5 of the CD-RAP, the annual report of the results of all GAC system monitoring completed in 2010 was reported on March 15, 2011. Historically, the treated water samples contain little or no PAH and the carbon is replaced prior to breakthrough. However, an anomalous result was obtained from the SLP10T extended analysis performed by Test America on the September 13, 2011. The extended analysis reported a total of 62.8 ng/l of carcinogenic PAH which is higher than the drinking water criteria and higher than the contemporaneous samples collected from well SLP10 before and after carbon treatment (analyzed for 31 PAH compounds). The data are provided in Appendix I of the 2011 Annual Monitoring Report. None of the "extra" compounds on the extended list contributed to the elevated CPAH total. Also, the split sample sent to PACE laboratory which was analyzed for 25 CPAH did not detect any CPAH (See Appendix J of the Annual Monitoring Report). Additional treated water samples were collected in accordance with CD-RAP Section 4.3.2. The reanalysis showed that no CPAH were detected and that relatively high levels of Other PAH were detected in the blanks (See Appendixes L and M of the Annual Monitoring Report). As a result of these tests, the carbon is due to be replaced in 2012 in accordance with the normal replacement schedule.

4.4 CD-RAP Section 5

Section 5.1 of the CD-RAP requires Reilly to monitor the City's active Mt. Simon-Hinckley Aquifer wells on an annual basis. Section 2(a) of the Reilly/City Agreement provides that the City complete this task on behalf of Reilly. Except for one well that was out of service for maintenance for the entire year, the City completed the Mt. Simon-Hinckley Aquifer monitoring in compliance with Section 5.1 of the CD-RAP. The results have been presented in the Annual Report issued in accordance with Section 3.4 of the CD-RAP.

4.5 CD-RAP Section 6

Section 6.1.3 of the CD-RAP requires Reilly to pump well W105 at a monthly average rate of 25 gallons per minute (gpm) until such time as the well's discharge is in compliance with cessation criteria contained in Section 6.1.5. On December 4, 1991, the Agencies authorized the City to discontinue the pumping of well W105, and on December 13, 1991, the well was shut down.

Section 6.1.4 of the CD-RAP requires Reilly to monitor well W105 on a biannual basis (i.e. even numbered years). Section 2(a) of the Reilly/Tar Agreement provides that the City complete this task on behalf of Reilly. Well W105 was not sampled in 2011 and will be sampled next in 2012.

4.6 CD-RAP Section 7

Section 7.1.3 of the CD-RAP requires Reilly to pump W23 at a monthly average rate of 50 gpm. Section 2(a) of the Reilly/City Agreement provides that the City operate W23 beginning the day pumping is started. A summary of the 2011 monthly pumping data is presented on Table 3. The monthly average flow rate ranged from 44 gpm to 70 gpm with a monthly average for 2011 of 56 gpm. W23 operates at its maximum capacity year round.

Section 7.2.7 of the CD-RAP requires Reilly to pump SLP4 at 300 gpm from May through September and at 900 gpm (or as near as practicable) during the months of October through April (an annual average of 650 gpm). Section 2(a) of the Reilly/City Agreement provides that the City assume this obligation for Reilly. A summary of the 2011 monthly pumping data is presented on Table 4. The City achieved an average monthly pumping rate of 985 gpm during 2011 and every month's average pumping rate exceeded 900 gpm.

Section 7.3 of the CD-RAP requires Reilly to monitor the Prairie du Chien-Jordan Aquifer as specified in Section 3 of the CD-RAP. Section 2(a) of the Reilly/City Agreement provides that the City will assume this obligation for Reilly. The City completed monitoring of the aquifer in substantial compliance with Sections 3 and 7.3 of the CD-RAP. Information relative to the monitoring can be found in the 2011 Annual Report to be submitted pursuant to Section 3.4 of the CD-RAP.

Section 7.4 of the CD-RAP discusses modifications to the gradient control system for the Prairie du Chien-Jordan aquifer. A June 23, 2010 letter outlining a revised schedule for gradient control assessment was submitted by the City. PCJ groundwater monitoring continued in 2011, and the City submitted a progress report to the Agencies on January 20, 2011. With the Agencies' help the City has been trying to obtain water level data for the City of Edina well field, in order to provide the next progress report on this subject.

In a related matter, the City submitted a report on January 6, 2011 to address a concern for vertical hydraulic gradients that had been expressed in the 2006 Five Year Review of the Reilly Site. The City's report concluded that no additional work was required to address vertical gradients. No response to the City's submittal has been received from the Agencies, although the June 2011 Five Year Review suggests that this issue has not yet been resolved.

4.7 CD-RAP Section 8

Section 8.3 of the CD-RAP authorizes the USEPA and MPCA to require Reilly to install and operate a gradient control well system for the purpose of preventing the further spread of ground water exceeding any of the Drinking Water Criteria defined in CD-RAP Section 2.2 in the St. Peter Aquifer. Section 2(a) of the Reilly/City Agreement provides that the City complete this task on behalf of Reilly. In response to April 1, 1991, correspondence from the Agencies on the issue, the City placed W410 in service on May 30, 1991.

A summary of the 2011 W410 pumping data is presented in Table 5. Table 5 indicates well W410 was pumped in compliance with the CD-RAP and the yearly average pumping rate for well W410 was 53 gpm.

Monitoring of St. Peter Aquifer monitor wells occurred in accordance with the provisions of the 2011 Sampling Plan. These data can be found in the 2011 Annual Report to be submitted pursuant to Section 3.4 of the CD- RAP.

4.8 CD-RAP Section 9

Section 9.1.3 of the CD-RAP requires Reilly to operate the Drift-Platteville Aquifer source control wells at a monthly rate of 25 gpm and monitor them on a quarterly basis. Section 2(a) of the Reilly/City Agreement provides that the City operate the wells beginning the day pumping is started and monitor them as required. Accordingly, the City has operated the wells and has performed necessary periodic inspections as outlined in a plan approved under Section 9.1.1 of the CD-RAP.

Summaries of the 2011 monthly pumping data for wells W420 and W421 are presented in Tables 6 and 7, respectively. Well W420 maintained an average monthly pumping rate of 40 gpm while the average pumping rate for W421 was 31 gpm for 2011. During 2011, these two pumping wells were in compliance with Section 9.1.3 of the CD-RAP.

Monitoring of the Drift-Platteville Aquifer source control wells occurred on a quarterly basis pursuant to the 2011 Sampling Plan. A report of the results can be found in the 2011 Annual Report issued pursuant to Section 3.4 of the CD-RAP.

In accordance with CD-RAP, Sections 9.2.3 and 9.5.1, the City began pumping well W439 (the Northern Area Drift Aquifer Gradient Control well) at 50 gpm in January 1996. A summary of the 2011 pumping data of the Northern Area Drift Aquifer Gradient Control well is presented in Table 8. Well W439 pumped at a monthly average rate of 58 gpm in 2011.

Monitoring of the Northern Area Drift Aquifer Gradient Control well occurred on a semi-annual basis pursuant to the 2011 Sampling Plan. A report of the results can be found in the 2011 Annual Report issued pursuant to Section 3.4 of the CD-RAP.

Monitoring of Drift-Platteville Aquifer monitor wells occurred in accordance with the provisions of the 2011 Sampling Plan. These data can be found in the 2011 Annual Report to be submitted pursuant to Section 3.4 of the CD- RAP.

4.9 CD-RAP Section 10

Section 10.1.1 and 10.2.1 of the CD-RAP requires Reilly to submit to the USEPA, MPCA and MDH a plan for investigating certain multi-aquifer wells that may be adversely affecting the Mt. Simon-Hinckley, Iron-ton-Galesville, Prairie du Chien-Jordan and St. Peter Aquifers.

On July 6, 1995, the MPCA issued a letter to the City and Reilly, regarding review of the report for Leaking Deep Multi-Aquifer Wells and St. Peter Aquifer Multi-Aquifer Wells. In these reports, the City stated that no further St. Peter and Deep Multi-Aquifer wells are believed to exist in the study area which would require abandonment. The Agencies' July 6, 1995 letter approved both of these reports. No further work is required at this time.

4.10 CD-RAP Section 11

Section 11.5.1 of the CD-RAP requires the City to prepare a plan which addresses, among other things, actions to place an adequate soil and vegetative cover as needed to prevent soil erosion on city parks on the Site. The City performed routine maintenance on city parks in 2011.

The City is engaged in a project that may reconstruct the Louisiana Avenue intersection with Trunk highway 7, just south of the Reilly Site. The project may make slight modifications to the grade of Louisiana Avenue and/or other areas within the Reilly Site property. Three soil borings were drilled on the Reilly Site to support the project. The City will continue to inform the Agencies about this project as it develops, and will perform all work on the Reilly Site in accordance with the requirements of CD-RAP Section 11.

4.11 CD-RAP Section 12

The Utility Superintendent has the responsibility to review all data upon receipt from the laboratory and to notify the Project Leader and Agencies of all exceedances of the Drinking Water Criteria in any municipal well, as outlined in Section 12.1.1 of the CD-RAP. Municipal well sampling results match historic levels of PAH, namely no detectable carcinogenic PAH, and concentrations of Other PAH are below the Drinking Water Criteria. There were no exceedances of the Drinking Water Criteria in a municipal well in 2010, with the exception of the result for SLP10T extended as discussed in Section 4.3 above.

5. SCHEDULED REMEDIAL ACTION PLAN ACTIVITIES

Table 9 summarizes the expected schedule for CD-RAP activities during 2012. Many of the schedule dates cannot be established definitely because they depend on Agency review, inspection, and approval. Ground water monitoring is an essential ongoing task.

TABLE 1**Status of Remedial Action Plan Activities – 2011**

RAP Section	Item	Activities
2.4	Well Construction and Abandonment	No wells were constructed or abandoned in 2011.
3.2./3.3	2011 Annual Sampling Plan	Plan submitted by the City on October 31, 2010. The plan was approved by the Agencies on April 12, 2011
3.2./3.3	2012 Annual Sampling Plan	Plan submitted by the City on November 1, 2011. Through a series of Agencies' comments and City responses, the 2012 Sampling Plan was approved on February 3, 2012.
3.4	2010 Annual Monitoring Report	Report submitted by the City on March 15, 2011. An Agencies' letter dated April 6, 2011 stated that the 2010 report was acceptable
4.2	Operation of SLP10/15 and GAC System Operation	The City operated the GAC system in compliance with the CD-RAP.
4.3	GAC System Monitoring	A treated sample from SLP10T exceeded the CPAH criteria, however re-sampling determined that the result was anomalous. Carbon is on a normal replacement schedule.
4.3.5	2010 GAC Annual Report	Report submitted by the City on March 15, 2011. Agencies approved report in a April 6, 2011 letter.
5.1	Mt.-Simon Hinckley Aquifer Monitoring	Completed as outlined in the 2010 Sampling Plan.
6.1.4	W105 Monitoring	Well is sampled biannually during even numbered years (i.e. 2012, 2014, 2016).
7.1.3	Operation of W23	Well W23 was operated in compliance with the CD-RAP.
7.2.7	Operation of SLP4	SLP4 operated in compliance with the CD-RAP.
7.3	Prairie du Chien-Jordan Aquifer Monitoring	Completed as outlined in the 2011 Sampling Plan.
7.4.1	Gradient control system modifications in the Prairie du Chien-Jordan Aquifer	The City prepared a status report on PCJ gradient control system modifications in 2011.
8.1.3	St. Peter Aquifer monitoring	Completed as outlined in 2011 Sampling Plan.

TABLE 1**Status of Remedial Action Plan Activities – 2011**

RAP Section	Item	Activities
8.3	Operation of W410	Well W410 was operated in compliance with the CD-RAP.
9.1.3	Operation/monitoring of Drift-Platteville Aquifer source control wells, W420 and W421	Wells W420 and W421 were operated in compliance with the CD-RAP.
9.2.3	Operation/monitoring of Drift-Platteville Aquifer gradient control well W422	In accordance with the Agencies' approval letter dated October 3, 2000, pumping of W422 was discontinued in October 2000.
9.5.1	Operation of W439	Well W439 was operated in compliance with the CD-RAP.
9.6	Drift-Platteville Aquifer monitoring	Completed as outlined in the 2011 Sampling Plan.
9.7.2	Platteville Aquifer gradient control well W434	An MPCA letter dated March 17, 2006 approved the cessation of pumping at well W434. Semi-annual monitoring was completed during 2010.
11.5.1	Development of the site	Routine site maintenance was completed at the Site in 2011. Three borings were installed to support reconstruction of Louisiana Avenue/TH7 intersection.
12.1.1	Exceedance of advisory levels	No exceedances occurred in 2011.

TABLE 2**SLP 10 2011 Pumping Data**

Month	Total Gallons Pumped	Monthly Average Flow Rate Gallons Per Minute
January	12,707,000	285
February	11,737,000	291
March	8,740,000	196
April	10,589,000	245
May	17,010,000	381
June	25,607,000	593
July	30,209,000	677
August	33,525,000	751
September	37,267,000	863
October	27,609,000	618
November	14,477,000	335
December	13,232,000	296
TOTAL	242,709,000	462

TABLE 3**W23 2011 Pumping Data**

Month	Total Gallons Pumped	Monthly Average Flow Rate Gallons Per Minute
January	2,784,550	62
February	2,506,760	62
March	2,741,190	61
April	2,633,060	61
May	2,634,460	59
June	2,336,810	54
July	1,974,520	44
August	1,201,010	27
September	2,397,680	56
October	2,825,040	63
November	2,475,130	57
December	3,126,230	70
TOTAL	29,636,440	56

TABLE 4**SLP4 2011 Pumping Data**

Month	Total Gallons Pumped	Monthly Average Flow Rate Gallons Per Minute
January	42,791,000	959
February	39,852,000	988
March	44,008,000	986
April	41,136,000	952
May	42,843,000	960
June	42,754,000	990
July	41,256,000	924
August	42,867,000	960
September	43,649,000	1,010
October	45,395,000	1,017
November	45,596,000	1,055
December	45,351,000	1,016
TOTAL	517,498,000	985

TABLE 5**W410 2011 Pumping Data**

Month	Total Gallons Pumped	Monthly Average Flow Rate Gallons Per Minute
January	2,162,230	48
February	1,885,040	47
March	1,998,180	45
April	1,390,380	32
May	1,770,360	40
June	1,957,840	45
July	2,646,750	59
August	2,936,570	66
September	2,660,780	62
October	2,792,530	63
November	2,704,420	63
December	2,745,460	62
TOTAL	27,650,540	53

TABLE 6**W420 2011 Pumping Data**

Month	Total Gallons Pumped	Monthly Average Flow Rate Gallons Per Minute
January	1,875,610	42
February	1,653,730	41
March	1,799,000	40
April	1,582,670	37
May	1,638,210	37
June	1,810,210	42
July	1,921,530	43
August	1,790,130	40
September	1,610,960	37
October	1,827,140	41
November	1,752,110	41
December	1,710,520	38
TOTAL	20,971,820	40

TABLE 7**W421 2011 Pumping Data**

Month	Total Gallons Pumped	Monthly Average Flow Rate Gallons Per Minute
January	1,009,560	23
February	1,052,880	26
March	1,289,830	29
April	1,204,040	28
May	1,316,250	29
June	1,434,960	33
July	1,385,550	31
August	1,559,710	35
September	1,516,340	35
October	1,656,230	37
November	1,516,330	35
December	1,434,310	32
TOTAL	16,375,990	31

TABLE 8

W439 2011 Pumping Data

Month	Total Gallons Pumped	Monthly Average Flow Rate Gallons Per Minute
January	2,490,810	56
February	2,416,650	60
March	1,115,560	25
April	2,039,440	47
May	2,015,730	45
June	2,293,370	53
July	2,861,570	64
August	3,577,940	80
September	4,138,880	96
October	3,018,050	68
November	2,316,200	54
December	2,181,820	49
TOTAL	30,466,020	58

TABLE 9**Expected Remedial Action Plan Activities – 2012**

RAP Section	Item	Expected Timetable
3.3	Sampling Plan for 2013	City to submit plan October 31, 2012
3.3	2013 QAPP submittal	City to submit QAPP June 30, 2012
3.4	2011 Annual Monitoring Report	City to submit report March 15, 2012
4.2	Operation and Maintenance of the GAC System at Wells SLP10 and 15	Ongoing
4.3	GAC Plant Monitoring	Continued monitoring in accordance with the RAP
4.3.5	2011 GAC Annual Report	City to submit report March 15, 2012
5.1	Mt. Simon-Hinckley Aquifer Monitoring	Refer to 2012 Sampling Plan
6.1.4	W105 Monitoring	W105 will be sampled in 2012.
7.1.3	Operation of W23	Ongoing
7.2.7	SLP4 Operation	Ongoing
7.3	Prairie du Chien-Jordan Aquifer Monitoring	Refer to 2012 Sampling Plan.
7.4.2	PCJ Aquifer gradient control system modifications.	The City will provide a progress report using Edina water level data.
8.1.3	St. Peter Aquifer Monitoring	Refer to 2012 Sampling Plan
8.3	St. Peter Aquifer Remedial Action Gradient Control Well Operation - W410	The City will continue to operate this well until cessation is authorized by the Agencies.
9.1.3	Operation of Drift-Platteville Aquifer Source Control Wells, W420 and W421	The City will continue to operate these wells until cessation is authorized by the Agencies.
9.3.3, 9.6	Drift-Platteville Aquifer Monitoring	Refer to 2012 Sampling Plan
9.5.1	Operation of Drift Aquifer Gradient Control Well - W439	The City will continue to operate this well until cessation is authorized by the Agencies.
11.5	Development Plan and Site Maintenance	Ongoing
12.1	Contingent Monitoring	Ongoing, if necessary.